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11 Attorneys for Defendant  
GOOGLE INC.

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

15 ORACLE AMERICA, INC.,

16 Plaintiffs,

17 v.

18 GOOGLE, INC.,

19 Defendant.

Case No. 3:10-cv-03561 WHA (DMR)

**DECLARATION OF RENNY HWANG IN  
SUPPORT OF GOOGLE'S MOTION FOR  
RECONSIDERATION OF THE COURT'S  
ORDER DENYING SEALING OF  
CONFIDENTIAL GOOGLE-APPLE  
INFORMATION**

Dept. Courtroom 4, 3rd Floor (Oakland)  
Judge: Hon. Donna M. Ryu  
Date: March 8, 2016  
Time: 11:00 a.m.

1 I, RENNY HWANG, declare as follows:

2 1. I am an attorney employed by Google Inc. ("Google"), where I have served as  
3 senior litigation counsel for the last six years. My job responsibilities include, but are not limited  
4 to, supervising our outside counsel in connection with litigation matters (such as this one), as well  
5 as familiarizing myself with the areas of Google's businesses and documentation concerning those  
6 businesses as they relate to litigation matters under my supervision. I submit this declaration in  
7 support of Google's Motion for Leave to File a Motion for Reconsideration of the Court's Order  
8 Denying Sealing of Google-Apple Information. I have knowledge of the facts set forth herein,  
9 and if called upon as a witness, I could testify to them competently under oath.

10 2. I have reviewed the transcript of the January 14, 2016 discovery hearing. On page  
11 29: lines 24-25 of the transcript Oracle's counsel disclosed information which purportedly reflects  
12 confidential financial terms of an agreement between Google and non-party Apple Inc. This  
13 information was derived from deposition testimony that Google has designated as "HIGHLY  
14 CONFIDENTIAL – ATTORNEY'S EYES ONLY" under the Protective Order that governs this  
15 case. Dkt. No. 66.

16 3. Google considers this information to be extremely confidential and commercially  
17 sensitive and has always treated it as such. This information is subject to stringent confidentiality  
18 requirements contained within the relevant agreement. Indeed, Google places strict limits on who  
19 has access to the terms of this agreement to ensure its confidentiality is retained. Also, Google  
20 does not disclose this information to the public. Public disclosure of this information could  
21 severely and adversely impact Google's ability to negotiate, among other things, similar terms  
22 with other third parties in connection with similar agreements now or in the future.

23 I declare under penalty of perjury under the laws of the State of California that the  
24 foregoing is true and correct to the best of my knowledge.

25 Executed on this 29th day of January, 2016 at Mountain View, California.

26 By: 

27 Renny Hwang  
28